

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 1:18-CV-68
	§	
UNITED STATES OF AMERICA, <i>et al.</i> ,	§	
	§	
Defendants,	§	
	§	
and	§	
	§	
KARLA PEREZ, <i>et al.</i> ,	§	
	§	
Defendant-Intervenors,	§	
and	§	
	§	
STATE OF NEW JERSEY	§	
	§	
Defendant-Intervenor.	§	

**DEFENDANT-INTERVENORS’ UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE RESPONSE TO FEDERAL DEFENDANTS’ RESPONSE TO
PLAINTIFF STATES’ MOTION FOR SUMMARY JUDGMENT**

Defendant-Intervenors Karla Perez, *et al.* (“Defendant-Intervenors”) respectfully request a seven day extension of time to file a response to Federal Defendants’ Response to Plaintiff States’ Motion for Summary Judgment. Plaintiff States filed their Motion for Summary Judgment on October 9, 2020. *See* Dkt. 486. All responses to the motion were due November 6, 2020. *See* Dkt. 473 and 482. Federal Defendants filed a response to Plaintiff States’ Motion for Summary Judgment. *See* Dkt. 501.

Pursuant to this Court’s orders at Dkt. 473 and Dkt. 482, the deadline for Defendant-Intervenors’ response to Federal Defendants’ response to Plaintiff States’ Motion for Summary

Judgment is this Friday, November 13, 2020. *See* Dkt. 473 and Dkt. 482. Because Plaintiff States' briefing in their motion for summary judgment raises complex issues in a case of national importance, Defendant-Intervenors request a seven day extension of time to respond to these issues. Defendant-Intervenors seek this extension for good cause and in the interests of justice, not for delay, and no party will be prejudiced if the extension is granted.

The Plaintiffs, Defendants, and Defendant-Intervenor State of New Jersey do not oppose Defendant-Intervenors' request.

CONCLUSION

For the foregoing reasons, Defendant-Intervenors respectfully request that the Court grant Defendant-Intervenors' Unopposed Motion for Extension of Time and set the deadline to respond to Federal Defendants' response for November 20, 2020.

Dated: November 11, 2020

Respectfully Submitted,

**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL FUND**

By: /s/ Nina Perales

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Attorneys for Defendant-Intervenors

CERTIFICATE OF CONFERENCE

I certify that on November 9, 2020, I emailed counsel for all parties regarding the relief requested in this motion. Counsel for Plaintiffs, Defendants, and the State of New Jersey each indicated that they do not oppose this motion.

/s/ Nina Perales

Nina Perales

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on November 11, 2020, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Nina Perales

Nina Perales

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KARLA PEREZ, *et al.*,

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Defendant-Intervenor.

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ORDER

On this date, the Court considered Perez Defendant-Intervenors' Unopposed Motion for Extension of Time to File Response to Federal Defendants' Response to Plaintiff States' Motion for Summary Judgment. After considering the Motion, the Court believes the Motion should be granted.

IT IS THEREFORE ORDERED that Perez Defendant-Intervenors' Unopposed Motion for Extension of Time is GRANTED. Perez Defendant-Intervenors' response should be filed no later than November 20, 2020.

SIGNED on this the day of November, 2020.

Hon. Andrew S. Hanen,
U.S. District Court Judge